

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	Docket No. 5:16-CR-96
	)	
MANDY LATULIPPE,	)	
Defendant.	)	

**MOTION FOR DETENTION**

NOW COMES the United States of America, by and through its attorney, Eric S. Miller, United States Attorney for the District of Vermont moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves an offense under the Controlled Substance Act for which a maximum term of imprisonment of ten years or more is prescribed, and a serious risk that defendant will flee. *See* 18 U.S.C. §§ 3142(f)(1)(C), 3142(f)(2)(A).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release that will reasonably assure the safety of the community.

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant under § 3142(e). The presumption applies because there is probable cause to believe the defendant committed a drug offense that carries a maximum sentence of more than ten years.

4. Time For Detention Hearing. The United States requests the court conduct the detention hearing after the three day continuance. The government believes that the defendant is

an opiate user and that time is necessary to assess the impact of the defendant's drug use on the possibility of release.

5. Other Matters: The government has not yet reviewed the Pre-trial Services Report.

Dated at Burlington, in the District of Vermont, July 20, 2016.

Respectfully submitted,

UNITED STATES OF AMERICA

ERIC S. MILLER  
United States Attorney

By: */s/ Paul J. Van De Graaf*  
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**CERTIFICATE OF SERVICE**

I, Liza G. LaBombard, Legal Assistant for the United States Attorney for the District of Vermont, do hereby certify that on July 20, 2016, I electronically filed the Government's **MOTION FOR DETENTION** with the Clerk of the Court using the CM/ECF system.

Dated at Burlington, in the District of Vermont, July 20, 2016.

/s /Liza G. LaBombard  
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